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Macy's Retail Holdings LLC

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MARY A. POOL,

12 Plaintiff,

13 v.

14 MACY'S RETAIL HOLDINGS LLC, a foreign
15 limited liability company; BLUE CHIP 2000
16 COMMERCIAL CLEANING, INC., a foreign
17 corporation; DOE EMPLOYEES I through X,
inclusive; DOES I through X, inclusive; and
ROE CORPORATIONS I through X, inclusive,

18 Defendants.
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Case No.: 2:22-cv-00050-JCM-NJK

**STIPULATION AND ORDER TO
DISMISS WITH PREJUDICE**

20 IT IS HEREBY STIPULATED, by and between Defendant MACY'S RETAIL
21 HOLDINGS, LLC, by and through its attorneys, PAUL A. ACKER, ESQ., and MATTHEW B.
22 BECKSTEAD, ESQ., of the law firm RESNICK & LOUIS, P.C.; Plaintiff MARY POOL, by and
23 through her attorneys, GEORGE T. BOCHANIS, ESQ., and EUNICE M. BEATTIE, ESQ., of the
24 law firm GEORGE T. BOCHANIS, LTD.; and Defendant BLUE CHIP 2000 COMMERCIAL
25 CLEANING, INC., by and through its attorneys, SCOTT R. COOK, ESQ., and DAVID T.
26 BLAKE, ESQ., of the law firm WOLFE & WYMAN, LLP, that the above-captioned action and
27 any and all claims asserted by Plaintiff in her Third Amended Complaint [ECF No. 48] against
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1 Defendant MACY’S RETAIL HOLDINGS, LLC, and Defendant BLUE CHIP 2000
2 COMMERCIAL CLEANING, INC., in this action are hereby dismissed with prejudice. Each party
3 is to bear their own attorney fees, interest, and costs.

4 It is further stipulated between Defendant MACY’S RETAIL HOLDINGS, LLC, and
5 Defendant BLUE CHIP 2000 COMMERCIAL CLEANING, INC., that they each agree to forever
6 release, waive, forego and abandon any and all past, present, and future losses, damages, liability
7 or claims against each other that arise out of or relate to the September 18, 2019, incident described
8 in Plaintiff’s Third Amended Complaint [ECF No. 48], including, but not limited to, claims and
9 crossclaims for contribution, indemnity, and/or equitable indemnity.

10 Pursuant to the foregoing Stipulation, the Motion for Determination of Good Faith
11 Settlement [ECF No. 73] filed by Defendant BLUE CHIP 2000 COMMERCIAL CLEANING,

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INC. is moot and is hereby withdrawn.

Dated this 24th day of August 2023

RESNICK & LOUIS, P.C.

/s/ Matthew B. Beckstead

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8925 West Russell Road, Suite 220
Las Vegas, Nevada 89148
Attorneys for Defendant Macy's Retail Holdings LLC

Dated this 24th day of August 2023

GEORGE T. BOCHANIS, LTD.

/s/ George T. Bochanis

GEORGE T. BOCHANIS, ESQ.
Nevada Bar No. 2262
EUNICE M. BEATTIE, ESQ.
Nevada Bar No. 10382
631 South Ninth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff Mary Pool

Dated this 24th day of August 2023

WOLFE & WYMAN, LLP

/s/ David T. Blake

SCOTT R. COOK, ESQ.
Nevada Bar No. 5265
DAVID T. BLAKE, ESQ.
Nevada Bar No. 11059
6757 Spencer Street
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Attorneys for Defendant Blue Chip Commercial Cleaning 2000, Inc.

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

DATED: August 25, 2023